

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143  
Honorable T.S. Ellis, III  
Hearing: August 27, 2021  
Trial: October 19, 2021

**MOTION TO SEAL PORTIONS OF REPLY TO GOVERNMENT OPPOSITION**

Defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court, pursuant to Local Crim. R. 49 for entry of an Order sealing portions of his Reply to the Government's Opposition to his Motion to Supplement the Record and Renew his Motion to Compel Exculpatory Material or, in the Alternative, to Submit Exculpatory Material for *In Camera* Review. The grounds for the requested relief are set forth in the non-confidential memorandum filed contemporaneously with this motion.

Respectfully submitted,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served this 23rd day of August 2021, on all counsel of record.

/s/ Jonathan Jeffress

Jonathan Jeffress